

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-12-13)

The United States Postal Service hereby provides its response to the following interrogatories of Magazine Publishers of America, Inc.: MPA/USPS-12-13, filed on November 26, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking:



Susan M. Duchek

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December 10, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-12. Please refer to the Postal Service's responses to MPA/USPS-3 and MPA/USPS-7 where it discussed the conversion of routes to the delivery point sequence vertical flat casing (DPS VFC) work method.

(a) How many routes in total were converted to the DPS VFC method?

(b) On what date was the conversion completed?

Response:

(a) The count of 95,663 provided in the response to MPA/USPS-7(c) is the best available figure.

(b) The statement "All of the conversion had been completed by the first quarter of Fiscal Year 2001" provided in response to MPA/USPS-3(c) is the most precise date available.

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MPA/USPS-13. Please refer to the Postal Service's responses to MPA/USPS-3(a) where it stated, "As such, most of the savings would be included in the Base Year 1000 costs that appear in the testimony of witness Meehan (USPS-T-11." Please quantify the Base Year 2000 cost savings that resulted from converting routes to the delivery point sequence vertical flat casing (DPS VFC) work method and provide your underlying calculations in an electronic spreadsheet format.

Response:

It is impossible to quantify the Base Year 2000 cost savings that resulted from converting routes to the delivery point sequence vertical flat casing (DPS VFC) work method. The Base Year 2000 costs are as presented in the case and they reflect any savings that resulted from any of the Postal Service's efforts.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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